

EXHIBIT C

CLASS IDENTIFICATION NUMBER: XXXXX

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

Abraham Kaff, et al v. Nationwide Credit, Inc.
Case No. 13-cv-5413-SLT-PK

NOTICE OF SETTLEMENT OF A CLASS ACTION

WHY AM I RECEIVING THIS NOTICE? You are a class member in a lawsuit filed against the defendant, Nationwide Credit, Inc. (“NCI”). You previously received a collection letter from NCI concerning an alleged American Express debt. You have the option to be included in a class action settlement alleging that a collection letter sent by NCI violates a federal law called the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”).

WHAT IS THIS LAWSUIT ABOUT? A settlement agreement has been reached in a class action lawsuit that claims that NCI violated the FDCPA. Plaintiffs claim that the letter NCI sent to them and class members violated the FDCPA because the letter stated “American Express is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more” or made a substantially identical statement. NCI denies it violated any laws and denies liability to Plaintiffs and the class. The Court has not decided which side is right, and NCI denies any liability or wrongdoing.

NCI has agreed to provide a settlement fund of \$160,000.00 to be distributed equally among class members who submit a valid claim form. To see a more detailed notice, full information on the Settlement, the Settlement Agreement, and other documents in the case, please visit this website: [_____](#).com.

WHAT CAN I GET OUT OF THE SETTLEMENT? If the Court approves the Settlement, class members who submit a valid claim form will be paid an equal share of the \$160,000.00 settlement fund. The class representatives will each receive \$2,500.00 for their statutory damages and for their service as class representatives. This amount will not be deducted from the class settlement fund. Class Counsel will petition the Court for attorneys’ fees in an amount of \$40,000.00.

HOW DO I GET MY PAYMENT? To receive a share of the settlement fund, you must submit a valid claim form by _____, 2016 (Postmark deadline). You must download the claim form from [_____](#).com and mail it to the Class Administrator. For help in submitting a claim form, please call (XXX)XXX-XXXX.

WHAT ARE MY OTHER OPTIONS? If you don’t want to be legally bound by the settlement, you must request exclusion from the settlement. If you wish to exclude yourself, your request must be postmarked by [40 days from class notice mailing date], 2016, and sent to the Class Administrator, Rust Consulting, Inc. at [address]. If you want to object to the settlement, you must write to the Court about why you don’t like the settlement and why you don’t want it approved. Your objection must be postmarked by [40 days from class notice mailing date], 2016, and you must also send a copy to Class Counsel at EDELMAN, COMBS, LATTURNER & GOODWIN, LLC, 20 S. Clark St., Suite 1500, Chicago, IL 60603, and NCI’s Counsel, Joseph Noga, Jenner & Block LLP, 39th Floor, New York, New York 10022-3908. If you do nothing, you will not receive a share of the settlement fund, but you will be bound by the terms of the settlement agreement.

WHEN AND WHERE WILL THE HEARING BE HELD TO APPROVE THE SETTLEMENT? The Court will hold a Fairness Hearing on _____, 2016 at X:XX x.m. at the U.S. District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201. At this time, the Court will decide whether to approve (1) the Settlement, (2) Class Counsel’s request for attorneys’ fees and costs, and (3) the incentive award for the class representatives.

INQUIRIES Any questions you have concerning this notice should be directed to Edelman, Combs, Lattuner & Goodwin, LLC, at the address listed above or by email (Info@edcombs.com). Please include the case name and number (“Kaff *et al.* v. NCI, Case No. 13-cv-5413-SLT-PK, File 29514”), your name and your address on any letters, and not just on the envelope.

DO NOT CONTACT THE COURT OR THE JUDGE REGARDING THIS NOTICE.

Additional information about this lawsuit is available at: [LINK]